

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**GRIDDY ENERGY, LLC<sup>1</sup>  
DEBTOR**

§  
§     **CASE NO. 21-30923 (MI)**  
§             **(Chapter 11)**

**CERTIFICATE OF COUNSEL REGARDING  
AMENDED MOTION OF PLAN ADMINISTRATOR FOR ORDER  
EXTENDING THE CLAIMS OBJECTION DEADLINE AND  
LIMITING NOTICE OF REQUESTS FOR FUTURE EXTENSIONS [DKT. 486]**

The undersigned counsel for **RUSSELL NELMS, Plan Administrator**, for the Modified Third Amended Plan of Liquidation for Griddy Energy, LLC under Chapter 11 of the Bankruptcy Code, dated May 26, 2021, [Dkt. No. 311](the “Plan”), filed by Griddy Energy, LLC (the “Debtor”) and confirmed by that certain Confirmation Order, dated July 7, 2021 [Dkt No. 386](the “Confirmation Order”), hereby submits this Certificate of Counsel regarding the Amended Motion for Order Extending the Claims Objection Deadline and Limiting Notice of Requests for Future Extensions (the “Motion”), filed on June 7, 2022 [Docket No. 486], as follows:

1. The Motion was filed on June 7, 2022 at Docket No. 486.
2. The Motion was served by Stretto on all parties who filed a proof of claim in the Debtor’s case as documented by the certificates of service filed as Docket Numbers 489 and 490.
3. The objection deadline associated with the Motion has passed.
4. The only objection to the Motion was filed by Bill and Gail Everett, [Docket No. 490](the “Everetts”).
5. The Everetts have agreed to the form of the agreed order granting the Motion, which provides that they receive notice of any future requests for an extension of time to file claim objections.
6. Attached hereto, as Exhibit “A” is a redlined version of the proposed order, showing changes from the proposed order submitted with the Motion.

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 1396. The mailing address for the Debtor is 115 Kay Lane, Westworth Village, TX 76114.

7. Attached hereto, as Exhibit “B”, is the proposed form of agreed order, which bears the signature of the Everetts and their agreement to the form of order (the “Agreed Order”).
8. The undersigned certifies that the Agreed Order resolves all known objections to the Motion.

Respectfully submitted,

/s/ Susan B. Hersh

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